

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

Clerk's Office  
U. S. District Court  
**FILED**  
01/13/2022  
Julia C. Dudley, Clerk  
By: /s/ Susan Moody  
Deputy Clerk

UNITED STATES OF AMERICA

v.

JERALD GRAY

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Criminal No. 7:22CR01

18 U.S.C. §§ 2252(a)(4)(B)

**INDICTMENT**

**COUNT ONE**

The Grand Jury Charges That:

1. On or about December 8, 2021 in the Western District of Virginia, and elsewhere, the Defendant, JERALD GRAY, did knowingly possess one or more matters which contained a visual depiction(s) that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, and so shipped and transported, by any means including by computer, and the production of such visual depiction(s) involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, and such visual depictions are of such conduct.
2. All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**NOTICE OF FORFEITURE**

3. Upon conviction of the felony offense alleged in this Information, the Defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1),
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2), and
- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

4. If any of the above-described forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence,
- b. has been transferred or sold to, or deposited with a third person,
- c. has been placed beyond the jurisdiction of the Court,
- d. has been substantially diminished in value, or
- e. has been commingled with other property which cannot be subdivided without difficulty,

then it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 13 day of January, 2022.

s/Grand Jury Foreperson  
FOREPERSON

  
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For CHRISTOPHER R. KAVANAUGH  
UNITED STATES ATTORNEY